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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

FEDERAL TRADE COMMISSION,
Petitioner,

v.

GENERAL LLC,

and

MEDIA LLC,
Respondents

Case No. 3:16-cv-00136-LRH-VPC

THE FEDERAL TRADE COMMISSION'S MOTION TO SEAL

The Federal Trade Commission respectfully moves this Court to place under seal its Motion to Compel Documents and Information ("Motion to Compel"). In support, the FTC states as follows:

1. The FTC's Motion to Compel contains discussions of, references to, and verbatim quotations from submissions provided to the FTC by respondents General LLC ("General") and Media LLC ("Media"). The FTC's Motion to Compel also attaches as exhibits the submissions themselves. These submissions and documents were produced in response to Civil Investigative Demands, a form of compulsory process, issued to respondents.¹

2. Under the Federal Trade Commission Act, 15 U.S.C. § 41 *et seq.*, and the FTC's Rules of Practice, *see* 16 C.F.R. Part 4, such materials produced in response to compulsory process are confidential and are subject to limits on disclosure. 15 U.S.C. § 57b-2(b); 16 C.F.R. §§ 4.10(a)(8); 4.10(g). Specifically, such material "may be disclosed in . . . court proceedings subject to . . . court protective or *in camera* orders." 16 C.F.R. § 4.10(g)(3).

3. FTC Rule of Practice 4.10(g) further provides that "[p]rior to disclosure of such material in a proceeding, the submitter [*e.g.*, General and Media] will be afforded an opportunity to seek an appropriate protective or *in camera* order." 16 C.F.R. § 4.10(g). In this case, however, the FTC has elected to seek to have its motion sealed to ensure that the confidential material is protected. The FTC notified counsel for General and Media of its intent to disclose this information and to file this motion for a seal by e-mail on Thursday, June 16, 2016.

¹ As discussed in the Reply, these submissions did not fully or completely respond to these CIDs.

For these reasons, the FTC respectfully requests that the Court seal its Motion to Compel. A proposed order is attached.

Respectfully submitted,

DAVID C. SHONKA
Acting General Counsel

/s/ Leslie Rice Melman
LESLIE RICE MELMAN
Assistant General Counsel for Litigation

/s/ Burke W. Kappler
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Dated: June 16, 2016

CERTIFICATE OF SERVICE

I hereby certify that on June 16, 2016, I will electronically file the foregoing Motion to Seal, with the Clerk of Court using the CM/ECF system for the District of Nevada, which will then send a notification of such filing to the following:

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Fax: 702-388-7406
Email: Shann@PecosLawGroup.com.
Counsel of record for respondents General LLC and Media LLC.

I further certify that on June 16, 2016, I will send electronic copies of to counsel for respondents by e-mail to the addresses indicated above.

/s/ Burke W. Kappler
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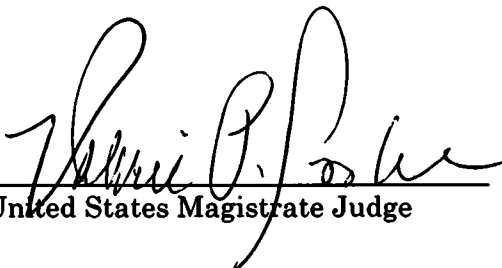
[PROPOSED] ORDER TO SEAL

Upon consideration of the Federal Trade Commission's Motion to Seal and the statements and arguments provided therein, it is by this Court hereby

ORDERED that the FTC's Motion to Compel Documents and Information ("Motion to Compel") be placed under seal; and

IT IS FURTHER ORDERED that the FTC's Motion to Compel be sealed until further Order of this Court.

SO ORDERED:


United States Magistrate Judge

Dated: July 19, 2016, Reno, NV.